

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

KIMBERLY WRIGHT,
Debtor

MANCHESTER TOWNSHIP,
Movant

v.

KIMBERLY WRIGHT

AND

CHARLES J. DEHART, III
CHAPTER 13 TRUSTEE,
Respondents

Chapter 13

Case No. 1-18-bk-00373-HWV

MANCHESTER TOWNSHIP'S RESPONSE TO DEBTOR'S
OBJECTION TO MANCHESTER TOWNSHIP'S AMENDED PROOF OF CLAIM No. 2

COMES NOW, this 29th day of August, 2018, Manchester Township, by and through its attorneys, CGA Law Firm, Lawrence V. Young, Esquire, and responds to Debtor's Objection to Amended Proof of Claim No. 2 filed by Manchester Township as follows:

1. Manchester Township has not placed an illegal lien on the Debtor's property. It must once again be pointed out that the Debtor avers that her address is 2536 Eastern Blvd. #122, York, Pennsylvania 17402, which is not in Manchester Township. The property that is the subject of the within action located at 1869 Brandywine Lane, York, Pennsylvania is in Manchester Township.

2. The Amended Proof of Claim filed on behalf of Manchester Township is believed to be the correct amount. It must be pointed out that the Amended Proof of Claim is premised upon a statutory lien, as this Honorable Court denied Manchester Township the right to file a judicial lien. Nevertheless, a statutory lien exists for unpaid sewer and refuse charges.

{01518109/1}

3. The above-referenced lien is not illegal. It exists as a matter of statute and does not exist because of any action taken by Manchester Township other than to file a Proof of Claim in the event that the Debtor actually can fulfill a Plan to resolve whatever dispute exists on 1869 Brandywine Lane, York (Manchester Township), Pennsylvania.

WHEREFORE, it is requested that the Debtor's Objection to Amended Proof of Claim No. 2 filed by Manchester Township be overruled.

Respectfully submitted,

CGA Law Firm

/s/Lawrence V. Young, Esquire

Lawrence V. Young, Esquire

Supreme Court No. 21009

135 North George Street

York, PA 17401

Telephone: 717-848-4900

Attorney for Movant

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

KIMBERLY WRIGHT,
Debtor

MANCHESTER TOWNSHIP,
Movant

v.

KIMBERLY WRIGHT

AND

CHARLES J. DEHART, III
CHAPTER 13 TRUSTEE,
Respondents

Chapter 13

Case No. 1-18-bk-00373-HWV

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on August 29, 2018, a true and correct copy of the attached document was served upon the following parties in the following manner:

| Name | Mode of Service |
|--|--|
| Kimberly Wright 2536 Eastern Blvd. #122 York, PA 17402 | United States First Class Mail, Postage Prepaid |
| Charles J. DeHart, III, Chapter 13 Trustee | Via CM/ECF |

I certify under penalty of perjury that the forgoing is true and correct.

Dated: 08/29/2018

/s/Lawrence V. Young, Esquire
Lawrence V. Young, Esquire

{01518109/1}